

Exhibit A-7

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

- - -

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

ROBERT J. MUELLER, DEEPROOT
FUNDS LLC (a/k/a dprrt Funds,
LLC, AND POLICY SERVICES INC.,

Defendants.

-and-

DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON
DR LLC, AND ROBERT J. MUELLER,
JEFFREY L. MUELLER, AND BELINDA
G. BREEN, AS CO-TRUSTEES OF THE
MB HALE OHANA REVOCABLE
TRUST,

Relief Defendants.

Civil Action No.
5:21-cv-785-XR

VIDEOTAPED DEPOSITION OF ANDREW J. FEDERICO

Thursday, July 13, 2023

9:34 a.m.

Carlile Patchen & Murphy

950 Goodale Boulevard

Suite 200

Columbus, Ohio 43212

REPORTED BY:

SUSAN L. COOTS, RPR

REGISTERED PROFESSIONAL REPORTER

JOB NO. 230713ARSI

09:42 1 understand a question, just ask me to clarify.

2 Are you taking any medications or any other
3 reason that you will not be able to answer the question
4 honestly, to the best of your recollection?

09:42 5 A No.

6 Q Okay. So what is your educational background?

7 A I have a Bachelor of Arts degree from Ohio
8 Wesleyan University and a Juris Doctorate degree from
9 Capital University Law School.

09:43 10 Q And when did you get your B.A.?

11 A 1972.

12 Q And when did you get your J.D.?

13 A 1978.

14 Q Okay. And what was your first attorney

09:43 15 position?

16 A I was an attorney examiner with the Ohio
17 Division of Securities.

18 Q And how long did you have that position?

19 A Two and a half years.

09:43 20 Q So roughly 1978 to '81?

21 A '78 to 1980. End of 1980.

22 Q Okay. And then what did you do in 1980?

23 A I became an associate at Carlile, Patchen &
24 Murphy. It was a different name at that time. But...

09:43 25 Q Okay. Here in Columbus?

09:43 1 A Yes.

2 Q And what did you specialize in?

3 A Securities and corporate law.

4 Q Securities litigation or securities advice?

09:44 5 A Securities advice. I think the first thing
6 I did was a Form S-18 registration statement.

7 Q Okay. And at some point did your position
8 change at Carlile Patchen?

9 A I became a partner in 1983. I went to Of
09:44 10 Counsel sometime in the -- in the 1990s, but I don't
11 recall the exact date.

12 Q Okay. And when you were a partner at Carlile
13 Patchen did you specialize in securities --

14 A Yes.

09:44 15 Q -- law?

16 A Yes.

17 Q Okay. And then in the 1990s when you switched
18 over to Of Counsel, did you continue specializing in
19 securities law?

09:44 20 A Yes.

21 Q And are you currently Of Counsel at Carlile
22 Patchen?

23 A Yes.

24 Q Do you have any other professional licenses
09:45 25 besides a law license?

12:38 1 with clients?

2 A Yes.

3 Q And is this consis -- this email consistent
4 with Mr. Concilla's way of telling a client that a
12:38 5 particular document is completed and ready to be shown
6 to investors?

7 A Yes.

8 Q All right. And when you or Mr. Concilla
9 communicate to a client that a document is complete and
12:38 10 ready to be shared with investors, however that is
11 phrased, are you telling that client that the document
12 is compliant with the securities laws based on the
13 information that is available to you?

14 MS. WARDEN: Objection. Calls for
12:39 15 speculation. Vague.

16 A Yes.

17 Q And in communi -- in -- in making that
18 communication to a client, are you providing legal
19 advice?

12:39 20 A Yes.

21 Q That you expect the client to rely upon?

22 A Yes.

23 Q Correct? Okay.

24 All right. You testified earlier that there
12:39 25 are multiple different S-1s, PPMs, and other documents

1 CERTIFICATE

2 State of Ohio :
3 SS:
County of Franklin:

4 I, Susan L. Coots, Notary Public in and for
5 the State of Ohio, duly commissioned and qualified,
6 certify that the within named ANDREW J. FEDERICO was by
7 me duly sworn to testify to the whole truth in the cause
8 aforesaid; that the testimony was taken down by me in
9 stenotypy in the presence of said witness, afterwards
10 transcribed upon a computer; that the foregoing is a
11 true and correct transcript of the testimony given by
12 said witness taken at the time and place in the
13 foregoing caption specified.

14 I certify that I am not a relative, employee,
15 or attorney of any of the parties hereto, or of any
16 attorney or counsel employed by the parties, or
17 financially interested in the action.

18 IN WITNESS WHEREOF, I have set my hand and
19 affixed my seal of office at Columbus, Ohio, on this
20 18th day of July, 2023.

Susan L. Coots

21 _____
22 SUSAN L. COOTS, Notary Public
23 in and for the State of Ohio and
Registered Professional Reporter.

24 My Commission Expires January 10, 2025.
25